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Consultation Paper No. 4/2015
Compensation to the Consumer in the Event of Dropped Calls

Dear Madam,

1. I am participating in this consultation process as an individual and as a consumer of telecom services. My general comments and comments on specifics brought out in the consultation paper are as follows.

General

2. What is Call Drop for consumer is Call Completed for the TSP. There is no way to differentiate between the two. Either way TSP makes money on both. It is a cash cow for them. Hence, there is no reason as to why a TSP will proactively act on stopping it. Hence, intervention by the regulator or government is necessary to stop this menace.

3. **Per second pulse rate** : Easiest way to minimise call drop is to introduce 'pay only for what you use' policy. It is possible only if there is only one pulse rate and that is 'per second' pulse rate. All other pulse rates should be abolished. This is easy to implement and manage. TSPs make extra money not only on call drops but on all calls based on any other pulse rate.

4. It can be easily proven that TSPs make extra money on all calls other than per second pulse calls, be it a dropped or completed call. On an average TSPs make extra buck on each call, dropped or completed, which is equal to half the call rate irrespective of duration of the call. For example, if the call rate is Rs 1 per minute, av. extra amount charged by TSPs is 50 paise per call for unused time irrespective of the duration of the call. Count the number of call instead of MoU and calculate. It is huge money.

5. *Hence, **there should be only one pulse rate and that is per second pulse rate.** All other pulse rates must be abolished. There is no reason as to why TSPs should make any money at all on unused call time, be it a completed or a dropped call.*

6. This will at least result in not rewarding TSPs for poor service including call drops which is the case now. It is easy to implement and monitor. It can be implemented as early as tomorrow.

7. **Shortage of towers in congested and busy areas** : I live in Jaipur now. Before that I lived in Noida. It is my observation that problem of quality of service is more acute in outskirts than central busy districts / areas. While it is legit that there is problem in putting up towers in congested areas, there is no reason as to why it should be so in outskirts. Going by the logic of TSPs, the quality of service should be top class in outskirts as problem of availability of space for towers does not exist

there. Truth is .. ***it is a convenient excuse for not doing enough on capex and opex. Spend Less and Earn More is their mantra.***

Specifics

8. **Q 1.** I agree that consumer should not be charged for dropped call. I am in favour of only one pulse rate and that is per second pulse rate and against any other pulse rate be it minute or any other. I have already given my reasons for it.

9. The answer to other part is possible only if there is any system by which a dropped call can be differentiated from a completed call. If so 5 seconds is too less a time for it. A simple 'hello' will take more time, start to finish. And Yes last pulse should not be charged as charging for deficient service is improper.

10. **Q 2.** Yes I agree that consumer should not only be compensated for dropped call but also be compensated for the agony he/she endures because of this.

11. The compensation should be by credit in minutes {?} / seconds as it would be rate neutral.

12. **Q 3.** The limit should be equal to normal usage per call to be specified by TRAI after statistical analysis of call pattern and it should not be particular consumer specific.

13. **Q 4.** I have clearly stated in General section one specific suggestion. **Do away with all pulse rates other than per second.** I have also submitted reasons for it.

Conclusion

14. Even at the cost of repeating myself I reiterate that there should be only one pulse rate for voice calls and that is per second rate. It will at least solve the problem that consumers are not short changed.

15. Adherence to QoS parameters be strictly enforced. Independent auditors be appointed for rating TSPs on QoS.

16. Last but not the least TRAI may revisit all the amendments to Consumer Protection Regulation 2012. After all these amendments it is no more that but has become TSP Protection Regulation. TSPs have been pampered enough. Time has come to pamper the paying consumer. Those who can, be encouraged to continue and prosper. Those who can't, be encouraged to quit.

Thanks and Kind Regards,
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